

The Honorable James L. Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
CHADILLADA LAPANGKURA and
PORNCHAI CHAISEEHA,
Defendants.

No. 2:19-cr-00140-JLR

**MOTION FOR EARLY
TERMINATION OF
SUPERVISED RELEASE**

**NOTE ON MOTION CALENDAR:
July 9, 2021**

Comes Now Chadillada Lapangkura, defendant, and moves for an order terminating her term of Supervised Release. This motion is based on the files and records in the above-referenced case and upon the factual background set out in succeeding paragraphs.

I. INTRODUCTION

Defendant was convicted of Conspiracy to Defraud the United States in violation of 18 United States Code Section 371 in the Western District of Washington (2:19-cr-00140-JLR-001). On December 5, 2019, defendant was sentenced to serve a term of imprisonment of six months to be followed by a two-year term of Supervised Release. The Court allowed Ms. Lapangkura to

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1 self-report. She was incarcerated at FCI Dublin where she served her sentence
2 without incident. On June 18, 2020, she was released from custody and
3 commenced her term of Supervised Release. She has completed more than one
4 year on Supervised Release. She has now been placed on minimal supervision
5 status.

6 During her supervision, Ms. Lapangkura has been exemplary in every
7 possible way. She has complied with all Standard and Special Conditions of
8 Supervision. She has paid her fine, all restitution, and the penalty assessment
9 either before, or immediately after, sentencing. She has completed the required
10 sixty hours of community service during her first months of release, finishing in
11 November 2020.

12 Ms. Lapangkura is currently supervised by Emie Coronel of the United
13 States Probation Office. Ms. Coronel has advised counsel for Ms. Lapangkura
14 that Probation does not object to this motion for early termination of
15 Supervised Release. Likewise, Andrew Friedman of the United States
16 Attorney's Office has advised that his office does not object to early termination
17 of Supervised Release.

18 **II. ARGUMENT**

19 Based on this record of successful completion of all requirements of
20 Supervised Release, coupled with the fact that Probation has already moved
21 Ms. Lapangkura to minimal supervision status, we believe that she is an
22 excellent candidate for early termination of her term of Supervised Release. A
23 primary objective of Supervised Release is to ensure a smooth transition of a
24 criminal defendant who has completed a term of imprisonment back into the
25 community. Ms. Lapangkura has obviously made this transition. She has
26 resumed her responsibilities as a parent to two young boys. She has also begun

1 to step back into a consulting role with the restaurants that she and her
2 husband and co-defendant, Pornchai Chaiseeha, founded. There has never
3 been any suggestion that she will reoffend. In short, there is no further need
4 for Ms. Lapangkura to be on supervision.

5 **III. CONCLUSION**

6 For all the reasons set forth in this motion, Ms. Lapangkura respectfully
7 moves for the early termination of her term of Supervised Release.

8
9 DATED: June 30, 2021.

10 **YARMUTH LLP**

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